

From: [John Hebert](#)
To: [Russell Wasem](#)
Cc: [Jennifer Gaines](#); [Jude Andreasen](#); [Laura Parsons](#); [Dan Peacock](#)
Subject: Re: Fw: Mitigation- Rodenticides Questions
Date: 07/01/2009 04:37 PM

Rusty -

1. I think we would treat labeling for the rodenticide bait stations as we do for other similar bait stations (e.g., ant/roach stations). For those we require the following to be on the station: product name, registration number, a.i. statement, signal word with a modified KOROC statement like "Do not allow children or pets to play with the bait station", and a referral statement to the complete labeling. For rodenticide bait stations we should also add the labeling statement corresponding to which Tier it achieves (taken directly from the RRM). The mouse stations are larger than ant/roach stations so I would think they could add more language - maybe even a complete label? But at a minimum we would require the info I mentioned above.

2. If I understand what he's asking, I think that if the mitigation language is added by an "amendment" and not by reregistration we could allow old labels to be used through June 2011. This would keep a level playing field for all the products.

Let me know if you have any other questions.

John

▼ Russell Wasem---06/30/2009 10:47:54 AM---Hello Jen, John, Can you provide me the answer to John's number 1 question below?

From: Russell Wasem/DC/USEPA/US
To: John Hebert/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA
Cc: Laura Parsons/DC/USEPA/US@EPA, Jude Andreasen/DC/USEPA/US@EPA
Date: 06/30/2009 10:47 AM
Subject: Fw: Mitigation- Rodenticides Questions

Hello Jen, John,

Can you provide me the answer to John's number 1 question below?

For John's second questions. I believe we have clarified this to someone before, but I cannot remember who. Didn't we agree that the six month time limit, that is standard for label amendments, will not apply for rodenticides and that registrants have until 6/4/11 to stop release of products with non-compliant labels?

Thanks,
Rusty

----- Forwarded by Russell Wasem/DC/USEPA/US on 06/30/2009 10:34 AM -----

From: "John Lublinkhof" <jlublinkhof@belllabs.com>
To: Russell Wasem/DC/USEPA/US@EPA

Dear Rusty,

Rusty, I have a few additional questions on the rodenticide mitigation.

1) Regarding refillable bait stations - In the consumer retail market, baits need to be packaged with bait stations. In the case of a refillable bait station, we plan to offer less than one pound of one ounce blocks in a package with a bait station. The bait station would not have bait in it but users would insert the bait into the bait station when necessary. On page 37, there is a listing of mandatory label requirements. It refers to front panel text and use restrictions. My understanding is that this wording is to appear on the package label. What isn't clear is what actually needs to appear on the bait station itself? Is it the same wording as for the front panel text? If so, can this wording be embossed into the plastic material that the bait station is made of or does it have to be a sticker? The former is easier from a production standpoint, Also, what font size is needed.

2) Regarding implementation - On page 30 it says that "If a company has a product for which it requested revised labeling on or before Dec. 4, 2009, that on June 4, 2011 the company "must cease production with the old labeling and use up existing stocks of product with old labeling within six months." However, in the June 18, 2008 letter to registrants, it refers to the last day for "Release for Shipment" of Product Not Complying with Risk Mitigation Decision (June 4, 2011) and states that 'this limitation would apply to those products registered both on or after the publication of the Federal Register announcing availability of the decision. In this letter, it does not make any mention of existing products for which amendments are sought. Am I to assume that the page 30 statement holds?

I look forward to receiving clarification on the above points.

Thanks in advance for your help.

Best regards,

John Lublinkhof, Ph.D.

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